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August 2, 2021

**SENT VIA ECF**

The Honorable Paul S. Diamond  
United States District Court  
Eastern District of Pennsylvania  
14614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**Re: *Clare Schumacher v. 470 Manor Operating, LLC***  
**Civil Action No.: 21-2421**

Dear Judge Diamond:

I represent Plaintiff in the above-referenced matter. I write on behalf of the parties to respectfully request a referral of this matter for a settlement conference with a Magistrate Judge and for a brief stay of the deadline for Plaintiff to respond to Defendant's pending Motion to Dismiss while the parties explore the possibility resolution.

The above-referenced employment matter was filed on May 27, 2021. On July 26, 2021, Defendant filed a Partial Motion to Dismiss, which places Plaintiff's deadline to file a responsive brief on Monday, August 9, 2021. The parties, however, have begun to engage in settlement negotiations, and have exchanged an initial offer and demand. After conferring, the parties believe that this matter can be resolved, but may simply need the assistance of a Magistrate Judge to do so. Therefore, the parties respectfully request a referral of this matter to a Magistrate Judge for a settlement conference. Moreover, in order to conserve the expenditure of additional costs and attorneys' fees that would come with continued motion practice, which will only make resolution of this matter more difficult to achieve, the parties also respectfully request that Plaintiff's deadline to respond to Defendant's motion be stayed pending the outcome of the conference, with Plaintiff being provided 14 days to respond to the motion following the date of the conference should it be unsuccessful.

Therefore, the parties respectfully request a referral of this matter to a Magistrate Judge for a settlement conference and for a brief stay of the deadline for Plaintiff to respond to Defendant's Motion to Dismiss pending such a conference, should Your Honor be inclined to grant the parties' request.

If Your Honor requires any additional information, please do not hesitate to contact me. In any event, the parties appreciate Your Honor's consideration of this request.

Respectfully submitted,

**KARPF, KARPf & CERUTTI, P.C.**

*/s Timothy S. Seiler*

Timothy S. Seiler, Esq.

cc: All Counsel of Record (via ECF)